

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

In re:	:	X
WAREHOUSE 86, LLC,	:	Case No. 08-03423-EE
Debtor.	:	Chapter 11
	:	
SCK, INC. and RADIOSHACK CORPORATION,	:	X
Plaintiffs	:	Adv. Pro. No. 09-00139-EE
v.	:	
WAREHOUSE 86, LLC,	:	
Defendant.	:	
	:	X

NOTICE OF DEPOSITION OF WAREHOUSE 86, LLC

PLEASE TAKE NOTICE that the Plaintiffs SCK, Inc., and RadioShack Corporation (collectively, the “Plaintiffs”) will take the deposition upon oral examination of Defendant WAREHOUSE 86, LLC (“WAREHOUSE 86”) before a Notary Public pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure (“Rule 30(b)(6)”) and all applicable uniform court rules. The deposition will take place on May 5, 2010 at 9:00 a.m. at the law offices of Butler Snow, 1020 Highland Colony Parkway, Suite 1400, Ridgeland, Mississippi.

Pursuant to Rule 30(b)(6), WAREHOUSE 86 shall designate a corporate representative (or representatives) to testify with respect to the following topics:

(1) The Sublease entered into on July 11, 2006 by SC Kiosks, Inc. and WAREHOUSE 86 and any schedules relating thereto.

(2) Insurance acquired by WAREHOUSE 86 relating to the subject premises located at 481 Airport Industrial Drive, Suite 110, Southaven, Mississippi in Desoto County, Mississippi and all structures, appurtenances, contents, equipment and fixtures located thereon or therein or affixed thereto, including but not limited to conveyor system, racking system, inventory, business personal property, supplies, betterments and improvements, irrespective of ownership ("the insured premises").

(3) The documents and other information in WAREHOUSE 86's possession relating to the insured premises prior to the February 5, 2008 tornado loss.

(4) The value of the insured premises prior to the February 5, 2008 tornado loss.

(5) The documents and other information in WAREHOUSE 86's possession relating to the insured premises as a result of the February 5, 2008 tornado loss.

(6) The documents and other information in WAREHOUSE 86's possession relating to the insured premises after the February 5, 2008 tornado loss and before the February 11, 2008 fire loss and any work or repairs thereto sought, contracted, or performed during this period.

(7) The value of the insured premises after the February 5, 2008 tornado loss and before the February 11, 2008 fire loss.

(8) The documents and other information in WAREHOUSE 86's possession relating to the insured premises as a result of the February 11, 2008 fire loss and any work or repairs thereto sought, contracted, or performed as a result of that loss.

(9) The documents and other information in WAREHOUSE 86's possession relating to the insured premises after the February 11, 2008 fire loss.

- (10) The value of the insured premises after the February 11, 2008 fire loss.
- (11) WAREHOUSE 86's knowledge of any insurance claims, claims adjustment, and/or investigation as a result of the February 5, 2008 fire loss.
- (12) WAREHOUSE 86's knowledge of any insurance claims, claims adjustment, and/or investigation as a result of the February 11, 2008 tornado loss.
- (13) WAREHOUSE 86's communications with any representative of an insurer of the insured premises, or any part thereof, related to the February 5, 2008 tornado loss, including but not limited to:
 - a. Insurance claim(s);
 - b. Resolution of insurance claim(s).
- (14) WAREHOUSE 86's communications with any representative of an insurer of the insured premises, or any part thereof, related to the February 11, 2008 fire loss, including but not limited to:
 - a. Insurance claim(s);
 - b. Resolution of insurance claim(s).
- (15) WAREHOUSE 86's communications with the Plaintiffs related to the February 5, 2008 tornado loss.
- (16) WAREHOUSE 86's communications with the Plaintiffs related to the February 11, 2008 fire loss.
- (17) WAREHOUSE 86's communications with Industrial Developments International, Inc., or any of its affiliates, agents, assigns, associates, attorneys, employees, insurers, representatives, or successors-in-interest (hereinafter, "IDI") related to the February 5, 2008 tornado loss.

(18) WAREHOUSE 86's communications with IDI related to the February 11, 2008 fire loss.

(19) The subject matter of, and information contained in, all documents requested in the Plaintiffs' Requests for Production of Documents to WAREHOUSE 86, and responses thereto.

(20) The subject matter of information requested in the Plaintiffs' First Set of Interrogatories to WAREHOUSE 86, and responses thereto.

(21) WAREHOUSE 86's defenses to the Plaintiffs' Complaint filed in this matter.

(22) WAREHOUSE 86's counterclaim filed in this matter.

Respectfully submitted, this the 23rd day of April, 2010.

SCK, INC. and RADIOSHACK CORPORATION

By: /s/ W. Lee Watt
W. Lee Watt

Marcus M. Wilson (MS Bar #7308)
W. Lee Watt (MSB #6998)
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CERTIFICATE OF SERVICE

I, W. Lee Watt, do hereby certify that I have this day forwarded a true and correct copy of the foregoing document *via* Electronic Case Filing System to the following:

Stephen Rosenblatt
Robert M. Frey

Dated this, the 23rd day of April, 2010.

/s/ W. Lee Watt

W. Lee Watt